

United States of America
Department of Labor
Wage and Hour Division

Exhibit B

SUBPOENA DUCES TECUM

TO: Quality Inn and Suites - Danville

You are hereby required to appear before Wage and Hour Investigator _____
Luis Nieves Jr. *of the* WAGE AND HOUR DIVISION, UNITED STATES
DEPARTMENT OF LABOR, *at* 2300 Vartan Way, Suite 255

in the City of Harrisburg, Pennsylvania 17110 *on this* 4th *day of*
March, 2022 *at* 11 o'clock a. *m. of that day, regarding*
Fair Labor Standards Act Investigation of Quality Inn and Suites - Danville

*And you are hereby required to bring with you and produce at said time and place the
following books, papers, and documents:*

See ATTACHMENT

FAIL NOT AT YOUR PERIL



IN TESTIMONY WHEREOF, *I have hereunto affixed my
signature and the seal of the United States Department of
Labor at Philadelphia, Pennsylvania this*

16th *day of* February, 2022

Mark H. Watson, Jr.
MARK H. WATSON, JR., REGIONAL ADMINISTRATOR
WAGE AND HOUR DIVISION
UNITED STATES DEPARTMENT OF LABOR

United States of America
Department of Labor
Wage and Hour Division

SUBPOENA DUCES TECUM

TO: Jacob Adigwe

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Luis Nieves Jr. _____ *of the* WAGE AND HOUR DIVISION, UNITED STATES
DEPARTMENT OF LABOR, *at* 2300 Vartan Way, Suite 255 _____

_____ in the City of Harrisburg, Pennsylvania 17110 on this 4th day of
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MARK H. WATSON, JR., REGIONAL ADMINISTRATOR
WAGE AND HOUR DIVISION
UNITED STATES DEPARTMENT OF LABOR

United States of America
Department of Labor
Wage and Hour Division

SUBPOENA DUCES TECUM

TO: Ezequiel Adigwe

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DEPARTMENT OF LABOR, at 2300 Vartan Way, Suite 255

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MARK H. WATSON, JR., REGIONAL ADMINISTRATOR
WAGE AND HOUR DIVISION
UNITED STATES DEPARTMENT OF LABOR

(02/2022) U.S. Department of Labor (Wage and Hour Division)

PROOF OF SERVICE

PLAINTIFF

U.S. DEPARTMENT OF LABOR (WAGE AND HOUR DIVISION)

COURT CASE NUMBER

HEARING

DEFENDANT

QUALITY INN AND SUITES

TYPE OF PROCESS

SUBPOENA DUCES TECUM

NAME OF INDIVIDUAL, ENTITY OR ORGANIZATION

**SERVE
AT****QUALITY INN AND SUITES**

ADDRESS (Street or RFD, Apartment No, City, State and Zip Code)

37 VALLEY WEST ROAD DANVILLE, PA 17821

I **ANTHONY BARNES** being duly sworn, depose and say that on **02/17/2022** I received this subpoena and pursuant to 29 CFR § 18.56(b) I hereby certify that a duplicate original of the within subpoena was served

personal service _____



located at _____

by leaving a copy of the original subpoena with **JESSIE HOUSTON (Manager)**a representative who is authorized to accept service of process at the principal place of business for **QUALITY INN - 37 VALLEY WEST ROAD DANVILLE, PA 17821**

by leaving the subpoena with a family member _____



at the Defendants usual place of adobe, and who resides in domicile therein at _____

Unable to serve the Defendant for the following reason _____

**DECLARATION OF SERVER**

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the proof of service is true and correct.

Signature of Server

Date

ANTHONY BARNES

Name of Server (Print Name)

CONSTABLE COURT SERVICES**7412 HINDON CIRCLE, STE 303****WINDSOR MILL, MD 21244****(888) 364-7774****constablecourtservices@gmail.com**

ATTACHMENT

INSTRUCTIONS

In response to the attached Subpoena Duces Tecum, you are commanded to produce all documents identified below in the form in which they are ordinarily maintained or stored.

You are required to search for, obtain and produce all responsive documents, including without limitation documents that are in your custody or control, but not in your immediate possession. This includes any responsive documents in the possession, custody, or control of any person acting on your behalf or under your direction and control such as your employees, accountants, agents, representatives, or advisors. Where such records are kept electronically, electronic data by tape, disc, or other electronic medium are requested.

These document requests apply to all documents within the possession and/or control of Quality Inn & Suites – Danville (the “company”) or any of its affiliates, subsidiaries, parents, predecessors, officers, directors, employees, agents, accountants, professional recordkeeping services, or other services providers. Unless otherwise stated, the applicable time period is 1/3/2019 to the present.

In the event that there are no responsive documents, records, papers, books, or any other requested information maintained or in the possession of Quality Inn & Suites – Danville, please specifically state that no such documents or electronic records exist. If you do not produce documents because you object to part of or an aspect of the request, please provide a written response stating the precise basis for the objection and produce all documents responsive to the remaining part or aspect of the requests.

This includes records or documents regardless of the form in which they are kept, paper or electronically stored information (ESI).

DOCUMENTS TO BE PRODUCED

- (1) Documents that show the names, addresses, and telephone numbers of all Quality Inn & Suites – Danville owners and company officers (e.g., President, Treasurer, Secretary, Board of Directors and other Corporate Officers) along with a copy of a company organizational chart;
- (2) Documents that show the legal name of the company and all other names used by the company (e.g., “Doing Business As” names).
- (3) Copy of company incorporation documents.
- (4) Documents that show the names and locations of any other inn, hotel or restaurant operated by any owner or officer of Quality Inn & Suites – Danville.

- (5) Documents demonstrating your gross annual dollar volume of sales for the entire enterprise. Please provide these records for the years 2018 to the present.
- (6) Documents that identify all current and former employees with their home address, hourly rate or salary, telephone number, hire and termination date, descriptive job title, shift, and whether you consider that employee exempt from overtime.
- (7) Copies of payroll and corresponding time records for employees from 1/3/2019 to the present, including hours worked, hourly rate, and evidence of payment made.
- (8) Documents that show all individuals (including their name(s), titles, wages paid, phone numbers, addresses, email addresses, hire and termination dates, and daily and weekly hours worked) who are responsible for making personnel decisions for the company such as determining pay rates, work schedules, hiring and/or firing of employees, contracting with individuals identified in item #1 above.
- (9) Documents that show the birth dates and proof of age for all employees under age 18 who worked for the company during the period 1/3/2019 to the present.
- (10) Documents that show Quality Inn & Suites – Danville’s Federal Employer Identification Number (FEIN).
- (11) Copy of FMLA policy (if applicable).
- (12) Copy of Employee Handbook (if available).